

EXHIBIT 11

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July 2, 2014

VIA EMAIL

Victoria Romanenko
Cuneo Gilbert & LaDuca LLP
507 C Street NE
Washington, DC 20002

**Re: *In re Automotive Parts Antitrust Litigation,*
Wire Harness Actions, No. 12-md-02311**

Dear Vicky:

We are sending this letter on behalf of Sumitomo Electric Industries, Ltd., Sumitomo Wiring Systems, Ltd., Sumitomo Electric Wiring Systems, Inc. (including K&S Wiring Systems, Inc.), and Sumitomo Wiring Systems (U.S.A.), Inc. (collectively "Sumitomo") in response to your letter of June 30, 2014 regarding the June 19, 2014 meet and confer regarding Sumitomo's Objections and Responses to Dealership Plaintiffs' First Request for Production of Documents Directed to All Defendants.

ADP Request No. 1: Sumitomo confirms that it will produce responsive, non-privileged documents in response to Request No. 1 related to training and instruction given to Sumitomo's employees, to the extent such documents exist. Sumitomo will produce these documents from the location(s) where the most comprehensive sets of documents likely reside.

ADP Request No. 9: Sumitomo does not believe that your letter accurately describes Sumitomo's position regarding Request No. 9. Sumitomo objected to this request because Sumitomo does not do business with any automobile dealers and is unlikely to have in its files any documents relating to automobile dealers or their purchases of vehicles from OEMs or other sources. Because such documents are unlikely to exist in any central source or custodian file, it is unduly burdensome for Sumitomo to search for these documents. However, Sumitomo agrees that to the extent it discovers documents that discuss automobile dealers through the course of its review, it will produce those documents. Please note, though, that Sumitomo does not believe that it has documents responsive to this request, thus it is unlikely that this information will be produced at a later date or any other time.

ADP Request No. 11: Sumitomo appreciates your detailed explanation of this request. Sumitomo has considered this clarified request and agrees to produce non-privileged documents responsive to this request, if any such documents exist.

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ADP Request Nos. 12 and 13: Sumitomo confirms that it will produce documents responsive to these requests to the extent it discovers those documents during the course of its search for other documents. That said, Sumitomo is unlikely to have any documents responsive to these requests because it is not an OEM and does not manufacture or price vehicles. Sumitomo has considered your request to add search terms designed to capture documents responsive to these requests. Although we are willing to continue this discussion, we believe that it will be unduly burdensome for Sumitomo to search for documents that it does not have and we do not plan to search for and review large amounts of documents in a futile attempt to find documents that do not exist.

ADP Request No. 15: To clarify, we stated that we, Latham, are not aware that any of the Sumitomo Defendants merged with any other entities that sold or manufactured Wire Harness Products during the discovery period. But Sumitomo does not intend to undertake the burden of determining whether any of the Sumitomo Defendants acquired any such companies over the thirteen-year discovery period, given that SEI and SWS are extremely large global companies with hundreds of subsidiaries worldwide, the majority of which are not relevant whatsoever to plaintiffs' claims in this case. Thus, the burden of responding to this request far outweighs any potential relevance.

Sumitomo believes this resolves any remaining disputes regarding any of ADPs' specific document requests. Sumitomo addressed the remaining common issues, including temporal and geographic scope, in Sumitomo's letter to all class plaintiffs on June 30, 2014.

Sincerely,

/s/ Allyson M. Maltas

Allyson M. Maltas
of LATHAM & WATKINS LLP

cc: Class Plaintiffs' Counsel
Defendants' Counsel